



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

MAY 18 2015

Frank Dean, General Superintendent  
Golden Gate National Recreation Area  
Fort Mason Building 201  
San Francisco, California 94123

Subject: Alcatraz Ferry Embarkation Draft Environmental Impact Statement, San Francisco, California  
[CEQ #20150041]

Dear Mr. Dean:

The U.S. Environmental Protection Agency (EPA) has reviewed the above referenced document. Our review and comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's (CEQ) NEPA Implementation Regulations at 40 CFR 1500 - 1508, and our review authority under Section 309 of the Clean Air Act.

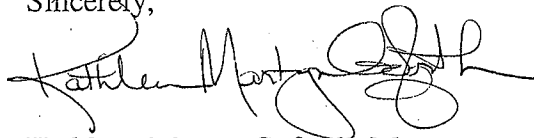
The Draft EIS evaluates alternatives for establishing a long-term ferry embarkation site for passenger service from the northern San Francisco waterfront to Alcatraz Island, as well as for establishing ferry embarkation sites at both Fort Baker and Fort Mason for special event service.

EPA has rated the Draft EIS as EC-2 -- "Environmental Concerns-Insufficient Information" (see Enclosure 1: "Summary of EPA Rating Definitions"). Our concerns pertain to the potential impacts of sediment disturbance during construction and/or operations. We recommend that the Final Environmental Impact Statement include additional information regarding dredging and dredged material management, and the potential impacts of sediment disturbance at the sites under consideration. We also recommend the inclusion of additional information regarding air quality, including greenhouse gas emissions, and energy efficiency and pollution prevention. Our detailed comments are enclosed (Enclosure 2).

We appreciate the opportunity to review this Draft EIS. Please send a hard copy of the Final EIS to this office (mailcode ENF-4-2) when it is officially filed with EPA's *e-NEPA*. If you have any questions,

please call me at (415) 972-3521 or contact Jeanne Geselbracht, our lead NEPA reviewer for this project, at [geselbracht.jeanne@epa.gov](mailto:geselbracht.jeanne@epa.gov) or (415) 972-3853.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kathleen Martyn Goforth', written in a cursive style.

Kathleen Martyn Goforth, Manager  
Environmental Review Section

Enclosures: (1) Summary of EPA Rating Definitions  
(2) EPA's detailed comments on the Alcatraz Ferry Embarkation Draft EIS

Electronic copy:

Brenda Goeden, San Francisco Bay Conservation and Development Commission  
Rob Lawrence, US Army Corps of Engineers, San Francisco District  
Beth Christian, California Regional Water Quality Control Board, Region 2  
Gary Stern, National Marine Fisheries Service  
Joe Dillon, National Marine Fisheries Service  
Becky Ota, California Department of Fish and Wildlife  
Arn Arreberg, California Department of Fish and Wildlife  
Alison Kirk, Bay Area Air Quality Management District

## SUMMARY OF EPA RATING DEFINITIONS

This rating system was developed as a means to summarize EPA's level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the EIS.

### ENVIRONMENTAL IMPACT OF THE ACTION

#### *"LO" (Lack of Objections)*

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

#### *"EC" (Environmental Concerns)*

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

#### *"EO" (Environmental Objections)*

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

#### *"EU" (Environmentally Unsatisfactory)*

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

### ADEQUACY OF THE IMPACT STATEMENT

#### *Category 1" (Adequate)*

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

#### *"Category 2" (Insufficient Information)*

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

#### *"Category 3" (Inadequate)*

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment"

U.S. EPA DETAILED COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE  
ALCATRAZ FERRY EMBARKATION PROJECT – MAY 2015

Dredged Materials

It is unclear whether or not the project may involve dredging. The Draft EIS mentions the Port of San Francisco's ongoing maintenance dredging between Fisherman's Wharf and Pier 96 (page 240); but, otherwise, does not discuss dredging or dredged material.

**Recommendations:** We recommend that the Final EIS address the following regarding dredging and placement of dredged materials for each of the project alternatives, including No Action.

- Describe the existing depths at and around each ferry pier under consideration, whether they are adequate as-is for ferry access and use, and whether initial construction dredging and/or future maintenance dredging may be needed.
- If any dredging may be needed, specify the dredge locations and amounts of sediment to be dredged and managed, and describe the potential impacts associated with these activities.
- Discuss any existing permits that cover dredging activities at each of the piers, identify the entity holding the permit (e.g., Port of San Francisco, U.S. Coast Guard) and indicate whether the permitted entity is actively maintaining the area or would continue to do so if a new use were established for the proposed project.
- Discuss the reuse and disposal options for dredged material in the bay per the San Francisco Bay Long Term Management Strategy for Dredging (LTMS). Please see <http://www.epa.gov/region9/water/dredging/ltms/>

We are unaware of any existing maintenance dredging permits for either Pier 3 or the pier proposed for ferry use at Fort Baker (located outside the breakwater). One pier inside the breakwater at Fort Baker is covered by the U.S. Coast Guard's maintenance dredging permit.

**Recommendation:** If the proposed project would involve dredging activities or locations not covered under existing permits, disclose in the Final EIS that permit applications would be submitted to the appropriate agencies and that sediment testing and disposal or reuse would be coordinated with the Dredged Material Management Office (DMMO) and conducted in accordance with the LTMS.

In analyzing the potential effects on fish from increased suspended sediment levels during construction at Pier 31½, the Draft EIS (p. 366) cites a 1998 Chambers Group report, which found that a similar but larger-scale sediment and benthos disturbance did not have long-term adverse effects on fish populations. It appears that the same assumption is made in assessing the potential impacts to fish from construction at piers 40 and 3. The Chambers report, however, considered only suspended solids, not contaminated sediments.

Fort Mason Pier 3 is very near San Francisco Marina's East Basin (Gashouse Cove) site, which exhibits highly contaminated sediments that are currently the subject of cleanup planning; however, this is not discussed in the Draft EIS. It is unknown at this time whether contaminated sediments may extend into areas that could be subject to disturbance from construction activities (e.g., pile driving, wharf repair, etc.) associated with the Pier 3 alternative. It is EPA's understanding that Pier 3 is not covered by an existing maintenance dredging permit, and the Draft EIS does not discuss whether or how the National

Park Service would be prepared to manage contaminated sediments if they are discovered in the project disturbance area.

**Recommendation:** We recommend that NPS consider screening-level sampling of sediments that could be disturbed by the project under the Pier 3 alternative. In addition to the recommendations above to describe any needs for future dredging and coordination with the DMMO, we recommend that the Final EIS describe the sediment chemistry. If sediments are contaminated, the Final EIS should describe any potential impacts of disturbing them during construction, operation, and (if necessary) maintenance dredging, including impacts to water quality, marine species, essential fish habitat, and recreational uses. Best management practices to minimize such impacts should be identified and their anticipated effectiveness described.

### Air Quality

We note several informational errors in the Air Quality sections of the Draft EIS, which we recommend be rectified in the Final EIS.

P. 122, Table 14: The annual National Ambient Air Quality Standard for PM<sub>2.5</sub> (particulate matter less than or equal to 2.5 micrometers in diameter) is 12 µg/m<sup>3</sup> rather than 15 µg/m<sup>3</sup>.

P. 300, Table 46 contains several errors:

- The official attainment status for PM<sub>2.5</sub> for the San Francisco Bay Area remains nonattainment until the State submits, and EPA approves, a redesignation request and maintenance plan. The applicable PM<sub>2.5</sub> *de minimis* threshold, therefore, is 100 tons per year (tpy).
- The San Francisco Bay Area is also a maintenance area for carbon monoxide (CO); therefore, the applicable CO *de minimis* threshold is 100 tpy.
- The applicable *de minimis* threshold for both oxides of nitrogen (NO<sub>x</sub>) and volatile organic compounds (VOC) in the San Francisco Bay Area marginal nonattainment area is 100 tpy.

Tables 52, 56 and 60: The appropriate NO<sub>x</sub> and VOC concentration unit for the purpose of addressing conformity here is “tpy” rather than “mt.” Furthermore, for purposes of demonstrating that construction and operation emissions would be below all applicable *de minimis* conformity thresholds, we recommend that these three tables also include the estimated PM<sub>2.5</sub> and CO emissions in addition to NO<sub>x</sub> and VOC. As discussed in the previous comment, *de minimis* thresholds apply to PM<sub>2.5</sub> and CO in the Bay Area.

Tables 51B, 55B and 59B are missing the criteria pollutants at the tops of the columns, and appear to be missing the CO<sub>2-e</sub> column.

### Climate Change

The Draft EIS (pp. 126 and 298) references the Council on Environmental Quality’s (CEQ) 2010 Draft Guidance on Greenhouse Gases and Climate Change. Please note that, on December 18, 2014, CEQ released Revised Draft Guidance on Greenhouse Gases and Climate Change for public comment. The revised guidance provides a reference point of 25,000 metric tons of CO<sub>2-e</sub> emissions on an annual basis “below which a GHG emissions quantitative analysis is not warranted unless quantification below that reference point is easily accomplished.” It also directs agencies to keep in mind that the reference point is for purposes of disclosure and not a substitute for an agency’s determination of significance under

NEPA. The Draft EIS appears to use the 25,000 mty CO<sub>2-e</sub> as a threshold of impact significance in the analyses of operations emissions for each of the action alternatives (e.g., on p. 306).

We also note that, while the Draft EIS estimates the operational CO<sub>2-e</sub> emissions under each alternative, there is no discussion of greenhouse gas emissions from construction activities under the action alternatives.

**Recommendations:** We recommend that the Final EIS include an updated discussion of CEQ's climate change guidance. We also recommend that the Final EIS estimate the potential greenhouse gas emissions from construction activities under the action alternatives. If quantification is not easily accomplished, a qualitative discussion of these emissions is recommended.

We encourage NPS to commit to energy efficiency and pollution prevention, including reduction of greenhouse gas emissions, in all aspects of the proposed project, to the extent possible. We offer the following procurement/sourcing, construction, and operation measures for your consideration and commitment in the Final EIS.

- Commit to sustainable building designs and incorporate Green Building/LEED certification, net zero energy designs, etc.
- Incorporate alternative energy components into the project, such as on-site distributed generation systems, solar thermal water heating, and combined heat and power.
- Commit to resource use efficiency, such as water conservation, reduced waste production, reuse or recycling of materials and construction and demolition debris, etc.
- Include use of alternative transportation fuels, biodiesel, electric vehicles, etc. during construction and operation.
- Adopt procurement policies and specifications for greener procurement of materials and products such as no or low-toxicity, recycled content, design for end-of-life, product takeback, etc.